

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF WISCONSIN**

JOHN DOE, et al.)
)
Plaintiffs,) No: 22-CV-01333
)
v.)
)
ST. JOHN'S NORTHWESTERN)
MILITARY ACADEMY, INC.,)
et al.)
Defendants.)

PLAINTIFFS' MOTION TO EXTEND DISCOVERY DEADLINES

NOW COMES Plaintiffs JOHN DOE, FATHER DOE, and MOTHER DOE, by and through their attorneys, ROMANUCCI & BLANDIN, LLC, and respectfully requests this Honorable Court for an extension of time to complete discovery in the above-captioned matter. In support thereof, Plaintiff, states as follows:

1. This is a personal injury action resulting from the repeated child sexual abuse of JOHN DOE during 2011-2012 at a military boarding school negligently owned and operated by Defendants.
2. On January 31, 2023, this Honorable Court entered a scheduling order (ECF 17) outlining the deadlines for discovery, setting the following deadlines:
 - a. Parties' initial disclosures by February 28, 2023.
 - b. Fact discovery completed by November 10, 2023.
 - c. Plaintiffs Expert Disclosures due by December 31, 2023.
 - d. Defendants Expert Disclosures due by April 1, 2024.
 - e. Plaintiffs Rebuttal Expert Disclosures due by June 3, 2024.
 - f. Dispositive Motions to be filed by August 5, 2024.
3. Plaintiffs propose the following discovery plan adjusting the dates set out in the January 31, 2023, Order, by only approximately 4 months:
 - a. Fact discovery to be completed by February 29, 2024.

- b. Plaintiffs Expert Disclosures due by April 20, 2024.
 - c. Defendants Expert Disclosures due by July 21, 2024.
 - d. Plaintiffs Rebuttal Expert Disclosures due by September 22, 2024.
 - e. Dispositive Motions to be filed by November 24, 2024.
4. The parties have completed initial disclosures as well as issued and answered written discovery requests, requiring each side to search for and identify documents from over ten years ago.
5. To date, eight depositions have also been completed, including all the Plaintiffs in this matter.
6. The parties have set four additional depositions before the end of November and are working on setting dates for another three depositions, including one that had been previously scheduled but was canceled by Plaintiffs' Counsel due to a health emergency.
7. As Plaintiffs previously alerted the Court, many witnesses in this case are no longer located in Wisconsin, no longer in Defendant's control, and even live outside of the country, including one critical witness who was also sexually abused by the same perpetrator as JOHN DOE at the Defendant's school.
8. Plaintiffs continue to diligently locate and attempt to serve at least four additional witnesses including the other identified victim and two witnesses who appear to live in Mexico, but many challenges have arisen in trying to locate and serve these witnesses.
9. Additionally, Plaintiffs seek an extension as one of the attorneys for Plaintiff is expecting the birth of a baby at any moment which will further complicate scheduling and coverage for depositions in the coming weeks.
10. A court may grant an extension of a deadline for good cause if the motion is made before the deadline has passed. F.R.C.P. 6(b)(1)(A). Plaintiffs have worked hard to complete discovery by the Court's deadline and only request an extension of a few months for the reasons set forth

above. Additionally, given the holiday season approaching, Plaintiffs anticipate difficulty coordinating dates with remaining witnesses and experts during November and December and therefore seek to extend the fact discovery deadline into February as outlined above.

11. This motion is not brought to unduly delay this matter.
12. This is the first request by Plaintiffs for an extension of discovery deadlines in this matter.
13. Counsel for Plaintiff conferred via email and telephone with Counsel for the Defendants who contest this motion.

WHEREFORE, based on the foregoing, Plaintiffs respectfully request an extension of the discovery deadlines in the above-captioned case.

Dated: November 1, 2023

Respectfully Submitted,

By: s/Valerie Letko
One of Plaintiffs Attorneys

Martin D. Gould
Valerie A. Letko
ROMANUCCI & BLANDIN, LLC
321 N. Clark Street, Suite 900
Chicago, Illinois 60654
T: (312) 458-1000
F: (312) 458-1004
mgould@rblaw.net
vletko@rblaw.net